☒ **Synthetic Minor Determination and/or** ☐ **Netting Determination**
Permit To Install **01-08878**

A. Source Description

London Industries operates a plastic parts coating facility in London, Madison County, non-attainment for ozone. The facility is currently a Synthetic Minor Stationary Source pursuant to Title V operating permit requirements for criteria pollutants and HAPs. London Industries proposes a facility-wide OC and HAP emission limitations, due to an increase in production on units R007 and R008, to limit potential to emit, remain non-Title V and to avoid being subject to the non-attainment provisions listed in Ohio Administrative Code (OAC) rule 3745-31. They have proposed to limit their coating and clean- up material usages, in order to remain a Synthetic Minor and to avoid being subject to the non-attainment provisions listed in OAC rule 3745-31.

B. Facility Emissions and Attainment Status

London Industries is currently classified as a Synthetic Minor Stationary Source pursuant to Title V operating permit requirements for all criteria pollutants and HAP(s). Madison County is in attainment for all criteria pollutants except ozone.

C. Source Emissions

Potential emissions of Hexane, single HAP, from all emissions units after the new units are installed and without any federally enforceable restrictions are 88.8 tons per year. Limiting the number of gallons of coating applied in emissions R005, R006, R007, R008, R009, and R010 will limit Hexane emissions from these emission units to 9.9 tons per rolling, 12-month summation. There are no other HAP contributing emission units at this facility.

Potential emissions of combined HAPs from all emissions units after the new units are installed and without any federally enforceable restrictions are 223.3 tons per year. Limiting the number of gallons of coating applied in emissions R005, R006, R007, R008, R009, and R010 will limit combined HAP emissions from these emission units to 19.8 tons per rolling, 12-month summation. There are no other HAP contributing emission units at this facility.

Potential emissions of OC from all emissions units after the new units are installed and without any federally enforceable restrictions are 445 tons per year. Limiting the number of gallons of coating applied in emissions R005, R006, R007, R008, R009, and R010 will limit OC emissions from these emission units to 41 tons per rolling, 12-month summation. There are no other OC contributing emission units at this facility.

D. Conclusion

London Industries will remain a Synthetic Minor facility and avoid being subject to the non-attainment provisions listed in OAC rule 3745-31 by means of limiting the number of gallons of coating applied, effectively restricting the facility PTE for a single HAP, combined HAP and OC to below both Major Stationary Source Title V operating and New Source Review permit requirements threshold levels. Monthly monitoring, record keeping and calculations, along with quarterly deviation reports for emission units R005, R006, R007, R008, R009, and R010, will be required to monitor compliance. Since allowable emissions are below both Major Stationary Source Title V operating and New Source Review permit requirements threshold levels, this facility will remain a minor stationary source.

State of Ohio Environmental Protection Agency

RE: DRAFT PERMIT TO INSTALL **CERTIFIED MAIL**
MADISON COUNTY

Street Address: Mailing Address: Lazarus Gov. Center
Lazarus Gov. Center **TELE:** (614) 644-3020 **FAX:** (614) 644-2329

Application No: 01-08878
Fac ID: 0149010100

DATE: 9/23/2004

London Industries
Scott Ford
350 E High St
London, OH 43140

You are hereby notified that the Ohio Environmental Protection Agency has made a draft action recommending that the Director issue a Permit to Install for the air contaminant source(s) [emissions unit(s)] shown on the enclosed draft permit. This draft action is not an authorization to begin construction or modification of your emissions unit(s). The purpose of this draft is to solicit public comments on the proposed installation. A public notice concerning the draft permit will appear in the Ohio EPA Weekly Review and the newspaper in the county where the facility will be located. Public comments will be accepted by the field office within 30 days of the date of publication in the newspaper. Any comments you have on the draft permit should be directed to the appropriate field office within the comment period. A copy of your comments should also be mailed to Robert Hodanbosi, Division of Air Pollution Control, Ohio EPA, P.O. Box 1049, Columbus, OH, 43266-0149.

A Permit to Install may be issued in proposed of final form based on the draft action, any written public comments received within 30 days of the public notice, or record of a public meeting if one is held. You will be notified in writing of a scheduled public meeting. Upon issuance of a final Permit to Install a fee of **$1200** will be due. Please do not submit any payment now.

The Ohio EPA is urging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Pollution Prevention at (614) 644-3469. If you have any questions about this draft permit, please contact the field office where you submitted your application, or Mike Ahern, Field Operations & Permit Section at (614) 644-3631.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section
Division of Air Pollution Control

CC: **USEPA** **CDO**

MADISON COUNTY

PUBLIC NOTICE
ISSUANCE OF DRAFT PERMIT TO INSTALL **01-08878** FOR AN AIR CONTAMINANT SOURCE FOR
London Industries

On 9/23/2004 the Director of the Ohio Environmental Protection Agency issued a draft action of a Permit To Install an air contaminant source for **London Industries**, located at **350 E High St, London**, Ohio.

Installation of the air contaminant source identified below may proceed upon final issuance of Permit To Install 01-08878:

Bonding process.

Comments concerning this draft action, or a request for a public meeting, must be sent in writing to the address identified below no later than thirty (30) days from the date this notice is published. All inquiries concerning this draft action may be directed to the contact identified below.

Isaac Robinson, Ohio EPA, Central District Office, 3232 Alum Creek Drive, Columbus, OH 43207-3417 [(614)728-3778]

DRAFT PERMIT TO INSTALL 01-08878

Application Number:	01-08878
Facility ID:	0149010100
Permit Fee:	**To be entered upon final issuance**
Name of Facility:	London Industries
Person to Contact:	Scott Ford
Address:	350 E High St London, OH 43140

Location of proposed air contaminant source(s) [emissions unit(s)]:
350 E High St
London, Ohio

Description of proposed emissions unit(s):
Bonding process.

The above named entity is hereby granted a Permit to Install for the above described emissions unit(s) pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the above described emissions unit(s) of environmental pollutants will operate in compliance with applicable State and Federal laws and regulations, and does not constitute expressed or implied assurance that if constructed or modified in accordance with those plans and specifications, the above described emissions unit(s) of pollutants will be granted the necessary permits to operate (air) or NPDES permits as applicable.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Director

A. State and Federally Enforceable Permit To Install General Terms and Conditions

1. Monitoring and Related Recordkeeping and Reporting Requirements

a. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall maintain records that include the following, where applicable, for any required monitoring under this permit:

i. The date, place (as defined in the permit), and time of sampling or measurements.

ii. The date(s) analyses were performed.

iii. The company or entity that performed the analyses.

iv. The analytical techniques or methods used.

v. The results of such analyses.

vi. The operating conditions existing at the time of sampling or measurement.

b. Each record of any monitoring data, testing data, and support information required pursuant to this permit shall be retained for a period of five years from the date the record was created. Support information shall include, but not be limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. Such records may be maintained in computerized form.

c. Except as may otherwise be provided in the terms and conditions for a specific emissions unit, the permittee shall submit required reports in the following manner:

i. Reports of any required monitoring and/or recordkeeping of federally enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

ii. Quarterly written reports of (i) any deviations from federally enforceable <u>emission limitations</u>, <u>operational restrictions</u>, <u>and control device operating parameter limitations</u>, excluding deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06, that have been detected by the testing, monitoring and recordkeeping requirements specified in this permit, (ii) the probable cause of such deviations, and (iii) any corrective actions or preventive measures taken, shall be made to the appropriate Ohio EPA District Office or local air agency. The written reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. See B.9 below if no deviations occurred during the quarter.

iii. Written reports, which identify any deviations from the federally enforceable monitoring, recordkeeping, and reporting requirements contained in this permit shall be submitted to the appropriate Ohio EPA District Office or local air agency every six months, i.e., by January 31 and July 31 of each year for the previous six calendar months. If no deviations occurred during a six-month period, the permittee shall submit a semi-annual report, which states that no deviations occurred during that period.

iv. Each written report shall be signed by a responsible official certifying that, based on information and belief formed after reasonable inquiry, the statements and information in the report are true, accurate, and complete.

2. Scheduled Maintenance/Malfunction Reporting

Any scheduled maintenance of air pollution control equipment shall be performed in accordance with paragraph (A) of OAC rule 3745-15-06. The malfunction, i.e., upset, of any emissions units or any associated air pollution control system(s) shall be reported to the appropriate Ohio EPA District Office or local air agency in accordance with paragraph (B) of OAC rule 3745-15-06. (The definition of an upset condition shall be the same as that used in OAC rule 3745-15-06(B)(1) for a malfunction.) The verbal and written reports shall be submitted pursuant to OAC rule 3745-15-06**.**
Except as provided in that rule, any scheduled maintenance or malfunction necessitating the shutdown or bypassing of any air pollution control system(s) shall be accompanied by the shutdown of the emission unit(s) that is (are) served by such control system(s).

3. Risk Management Plans

If the permittee is required to develop and register a risk management plan pursuant to section 112(r) of the Clean Air Act, as amended, 42 U.S.C. 7401 et seq. ("Act"), the permittee shall comply with the requirement to register such a plan.

4. Title IV Provisions

If the permittee is subject to the requirements of 40 CFR Part 72 concerning acid rain, the permittee shall ensure that any affected emissions unit complies with those requirements. Emissions exceeding any allowances that are lawfully held under Title IV of the Act, or any regulations adopted thereunder, are prohibited.

5. Severability Clause

A determination that any term or condition of this permit is invalid shall not invalidate the force or effect of any other term or condition thereof, except to the extent that any other term or condition depends in whole or in part for its operation or implementation upon the term or condition declared invalid.

6. General Requirements

a. The permittee must comply with all terms and conditions of this permit. Any noncompliance with the federally enforceable terms and conditions of this permit constitutes a violation of the Act, and is grounds for enforcement action or for permit revocation, revocation and reissuance, or modification, or for denial of a permit renewal application.

b. It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the federally enforceable terms and conditions of this permit.

c. This permit may be modified, reopened, revoked, or revoked and reissued, for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or revocation, or of a notification of planned changes or anticipated noncompliance does not stay any term and condition of this permit.

d. This permit does not convey any property rights of any sort, or any exclusive privilege.

e. The permittee shall furnish to the Director of the Ohio EPA, or an authorized representative of the Director, upon receipt of a written request and within a reasonable time, any information that may be requested to determine whether cause exists for modifying, reopening or revoking this permit or to determine compliance with this permit. Upon request, the permittee shall also furnish to the Director or an authorized representative of the Director, copies of records required to be kept by this permit. For information claimed to be confidential in the submittal to the Director, if the Administrator of the U.S. EPA requests such information, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality.

7. Fees

The permittee shall pay fees to the Director of the Ohio EPA in accordance with ORC section 3745.11 and OAC Chapter 3745-78. The permittee shall pay all applicable Permit To Install fees within 30 days after the issuance of this Permit To Install.

8. Federal and State Enforceability

Only those terms and conditions designated in this permit as federally enforceable, that are required under the Act, or any of its applicable requirements, including relevant provisions designed to limit the potential to emit of a source, are enforceable by the Administrator of the U.S. EPA, the State, and citizens under the Act. All other terms and conditions of this permit shall not be federally enforceable and shall be enforceable under State law only.

9. Compliance Requirements

a. Any document (including reports) required to be submitted and required by a federally

applicable requirement in this permit shall include a certification by a responsible official that, based on information and belief formed after reasonable inquiry, the statements in the document are true, accurate, and complete.

b. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the Director of the Ohio EPA or an authorized representative of the Director to:

i. At reasonable times, enter upon the permittee's premises where a source is located or the emissions-related activity is conducted, or where records must be kept under the conditions of this permit.

ii. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit, subject to the protection from disclosure to the public of confidential information consistent with ORC section 3704.08.

iii. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit.

iv. As authorized by the Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit and applicable requirements.

c. The permittee shall submit progress reports to the appropriate Ohio EPA District Office or local air agency concerning any schedule of compliance for meeting an applicable requirement. Progress reports shall be submitted semiannually, or more frequently if specified in the applicable requirement or by the Director of the Ohio EPA. Progress reports shall contain the following:

i. Dates for achieving the activities, milestones, or compliance required in any schedule of compliance, and dates when such activities, milestones, or compliance were achieved.

ii. An explanation of why any dates in any schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.

10. Permit To Operate Application

a. If the permittee is required to apply for a Title V permit pursuant to OAC Chapter 3745-77, the permittee shall submit a complete Title V permit application or a complete

Title V permit modification application within twelve (12) months after commencing operation of the emissions units covered by this permit. However, if the proposed new or modified source(s) would be prohibited by the terms and conditions of an existing Title V permit, a Title V permit modification must be obtained before the operation of such new or modified source(s) pursuant to OAC rule 3745-77-04(D) and OAC rule 3745-77-08(C)(3)(d).

b. If the permittee is required to apply for permit(s) pursuant to OAC Chapter 3745-35, the source(s) identified in this Permit To Install is (are) permitted to operate for a period of up to one year from the date the source(s) commenced operation. Permission to operate is granted only if the facility complies with all requirements contained in this permit and all applicable air pollution laws, regulations, and policies. Pursuant to OAC Chapter 3745-35, the permittee shall submit a complete operating permit application within ninety (90) days after commencing operation of the source(s) covered by this permit.

11. Best Available Technology

As specified in OAC Rule 3745-31-05, all new sources must employ Best Available Technology (BAT). Compliance with the terms and conditions of this permit will fulfill this requirement.

12. Air Pollution Nuisance

The air contaminants emitted by the emissions units covered by this permit shall not cause a public nuisance, in violation of OAC rule 3745-15-07.

B. State Only Enforceable Permit To Install General Terms and Conditions

1. Compliance Requirements

The emissions unit(s) identified in this Permit to Install shall remain in full compliance with all applicable State laws and regulations and the terms and conditions of this permit.

2. Reporting Requirements

The permittee shall submit required reports in the following manner:

a. Reports of any required monitoring and/or recordkeeping of state-only enforceable information shall be submitted to the appropriate Ohio EPA District Office or local air agency.

b. Except as otherwise may be provided in the terms and conditions for a specific emissions unit, quarterly written reports of (a) any deviations (excursions) from state-only required emission limitations, operational restrictions, and control device operating parameter limitations that have been detected by the testing, monitoring, and recordkeeping requirements specified in this permit, (b) the probable cause of such deviations, and (c) any corrective actions or preventive measures which have been or will be taken, shall be submitted to the appropriate Ohio EPA District Office or local air agency. If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters. (These quarterly reports shall exclude deviations resulting from malfunctions reported in accordance with OAC rule 3745-15-06.)

3. Permit Transfers

Any transferee of this permit shall assume the responsibilities of the prior permit holder. The appropriate Ohio EPA District Office or local air agency must be notified in writing of any transfer of this permit.

4. Termination of Permit To Install

This permit to install shall terminate within eighteen months of the effective date of the permit to install if the owner or operator has not undertaken a continuing program of installation or modification or has not entered into a binding contractual obligation to undertake and complete within a reasonable time a continuing program of installation or modification. This deadline may

be extended by up to 12 months if application is made to the Director within a reasonable time before the termination date and the party shows good cause for any such extension.

5. Construction of New Sources(s)

The proposed emissions unit(s) shall be constructed in strict accordance with the plans and application submitted for this permit to the Director of the Ohio Environmental Protection Agency. There may be no deviation from the approved plans without the express, written approval of the Agency. Any deviations from the approved plans or the above conditions may lead to such sanctions and penalties as provided under Ohio law. Approval of these plans does not constitute an assurance that the proposed facilities will operate in compliance with all Ohio laws and regulations. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed sources cannot meet the requirements of this permit or cannot meet applicable standards.

If the construction of the proposed emissions unit(s) has already begun or has been completed prior to the date the Director of the Environmental Protection Agency approves the permit application and plans, the approval does not constitute expressed or implied assurance that the proposed facility has been constructed in accordance with the approved plans. The action of beginning and/or completing construction prior to obtaining the Director's approval constitutes a violation of OAC rule 3745-31-02. Furthermore, issuance of the Permit to Install does not constitute an assurance that the proposed source will operate in compliance with all Ohio laws and regulations. Approval of the plans in any case is not to be construed as an approval of the facility as constructed and/or completed. Moreover, issuance of the Permit to Install is not to be construed as a waiver of any rights that the Ohio Environmental Protection Agency (or other persons) may have against the applicant for starting construction prior to the effective date of the permit. Additional facilities shall be installed upon orders of the Ohio Environmental Protection Agency if the proposed facilities cannot meet the requirements of this permit or cannot meet applicable standards.

6. Public Disclosure

The facility is hereby notified that this permit, and all agency records concerning the operation of this permitted source, are subject to public disclosure in accordance with OAC rule 3745-49-03.

7. Applicability

This Permit to Install is applicable only to the emissions unit(s) identified in the Permit To Install. Separate application must be made to the Director for the installation or modification of any other emissions unit(s).

8. Construction Compliance Certification

If applicable, the applicant shall provide Ohio EPA with a written certification (see enclosed form

if applicable) that the facility has been constructed in accordance with the Permit To Install application and the terms and conditions of the Permit to Install. The certification shall be provided to Ohio EPA upon completion of construction but prior to startup of the source.

9. Additional Reporting Requirements When There Are No Deviations of Federally Enforceable Emission Limitations, Operational Restrictions, or Control Device Operating Parameter Limitations (See Section A of This Permit)

If no deviations occurred during a calendar quarter, the permittee shall submit a quarterly report, which states that no deviations occurred during that quarter. The reports shall be submitted quarterly, i.e., by January 31, April 30, July 31, and October 31 of each year and shall cover the previous calendar quarters.

C. Permit To Install Summary of Allowable Emissions

The following information summarizes the total allowable emissions, by pollutant, based on the individual allowable emissions of each air contaminant source identified in this permit.

SUMMARY (for informational purposes only)
TOTAL PERMIT TO INSTALL ALLOWABLE EMISSIONS

Pollutant	Tons Per Year
OC	41
PE	5.4
Individual HAP	9.9
Combined HAP	24.9

A. State and Federally Enforceable Permit To Install Facility Specific Terms and Conditions

None

B. State Only Enforceable Permit To Install Facility Specific Terms and Conditions

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R005 - Paint Line #1 with Electric Oven, modification of PTI 01-6487 issued 3/19/97	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions Limitations/Control Measures	
	R009 and R010.
	See Sections B.2, B.3, and B.4 below.
Organic compound (OC) emissions shall not exceed 17 lbs/hr.	See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008,	

2. Additional Terms and Conditions

2.a The hourly OC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 14,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

3. Coating content may not exceed 5.66 pounds OC per gallon. Cleanup content may not exceed 6.82 pounds OC per gallon.

4. The maximum annual clean up usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

a. the name and identification number of each coating and cleanup material, as applied;

b. the number of gallons of each coating employed;

c. the number of gallons of each cleanup material employed;

d. the OC content of each coating, in pounds of OC per gallon of coating, excluding water and exempt solvents; and

e. the OC content of each cleanup material, in pounds of OC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:

a. the monthly OC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., [(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 lbs/ton), in tons;

b. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;

c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.

d. the individual HAP[1] content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;

e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from d);

f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP[1] content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP[1] content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

g. the total combined HAP emissions from all coating and cleanup materials employed, in

pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for emissions unit R005 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: n-Hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 4.25
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1267.1
   MAGLC (ug/m3): 4190

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the

handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. an identification of each hour which the hourly OC emission rate from the coatings and

cleanup materials exceeded 17 lbs/hr, and the actual hourly OC emission rate for each such hour;

b. the OC content limit for coating materials;

c. the OC content limit for cleanup materials;

d. the rolling, 12-month coating usage limitation;

e. the rolling, 12-month cleanup usage limitation;

f. the rolling, 12-month total individual HAP emission limitation;

g. the rolling, 12-month total combined HAP emissions limitation; and

h. the rolling, 12-month total OC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions

3. The permittee shall submit annual reports which specify the OC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 17 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.

b. Emission Limitation:
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily OC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation may be used:

E = (maximum coating solids usage rate in pounds per hour) (1-TE) (1-CE)

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for the automated adhesive coating line)

CE = fractional control efficiency of the control equipment (87.5% for dry filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

h. USEPA Method 24 shall be used to determine the OC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R006 - Paint Line #2 with Electric Oven, modification of PTI 01-6487 issued 3/19/97	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions Limitations/Control Measures	
	R005, R006, R007, R008, R009 and R010.
	See Sections B.2, B.3, and B.4 below.
Organic compound (OC) emissions shall not exceed 17 lbs/hr.	See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units	

2. Additional Terms and Conditions

2.a The hourly OC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 14,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

3. Coating content may not exceed 5.66 pounds OC per gallon. Cleanup content may not exceed 6.82 pounds OC per gallon.

4. The maximum annual clean up usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the number of gallons of each coating employed;

   c. the number of gallons of each cleanup material employed;

d. the OC content of each coating, in pounds of OC per gallon of coating, excluding water and exempt solvents; and

e. the OC content of each cleanup material, in pounds of OC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:

a. the monthly OC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., [(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 lbs/ton), in tons;

b. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;

c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.

d. the individual HAP[1] content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;

e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);

f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP[1] content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP[1] content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

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A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for emissions unit R006 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: n-Hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 4.25
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1267.1
   MAGLC (ug/m3): 4190

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. an identification of each hour during which the hourly OC emission rate from the coatings and cleanup materials exceeded 17 lbs/hr, and the actual hourly OC emission rate for each such hour.

b. the OC content limit for coating materials;

c. the OC content limit for cleanup materials;

d. the rolling, 12-month coating usage limitation;

e. the rolling, 12-month cleanup usage limitation;

f. the rolling, 12-month total individual HAP emission limitation;

g. the rolling, 12-month total combined HAP emissions limitation; and

h. the rolling, 12-month total OC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions.

2. The permittee shall submit annual reports which specify the OC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 17 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.

b. Emission Limitation:
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily OC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation may be used:

E = (maximum coating solids usage rate in pounds per hour) (1-TE) (1-CE)

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for the automated adhesive coating line)

CE = fractional control efficiency of the control equipment (87.5% for dry filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

h. USEPA Method 24 shall be used to determine the OC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R007 - Honda adhesive coating line no. 1 with two spray booths and one IR oven, modification of PTI 01-8581 issued 4/16/02	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions Limitations/Control Measures	
	R009 and R010.
	See Sections B.2, B.3, and B.4 below.
Organic compound (OC) emissions shall not exceed 17 lbs/hr.	See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008,	

2. Additional Terms and Conditions

2.a The hourly OC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 14,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

3. Coating content may not exceed 5.66 pounds OC per gallon. Cleanup content may not exceed 6.82 pounds OC per gallon.

4. The maximum annual clean up usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the number of gallons of each coating employed;

   c. the number of gallons of each cleanup material employed;

d. the OC content of each coating, in pounds of OC per gallon of coating, excluding water and exempt solvents; and

e. the OC content of each cleanup material, in pounds of OC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:

a. the monthly OC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., [(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 lbs/ton), in tons;

b. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;

c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.

d. the individual HAP[1] content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;

e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);

f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP[1] content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP[1] content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by

contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for emissions unit R007 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: n-Hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 4.25
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1267.1
   MAGLC (ug/m3): 4190

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. an identification of each hour during which the hourly OC emission rate from the coatings and cleanup materials exceeded 17 lbs/hr, and the actual hourly OC emission rate for each such hour;

   b. the OC content limit for coating materials;

   c. the OC content limit for cleanup materials;

d. the rolling, 12-month coating usage limitation;

e. the rolling, 12-month cleanup usage limitation;

f. the rolling, 12-month total individual HAP emission limitation;

g. the rolling, 12-month total combined HAP emissions limitation; and

h. the rolling, 12-month total OC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions

2. The permittee shall submit annual reports which specify the OC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 17 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.

b. Emission Limitation:
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily OC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation may be used:

E = (maximum coating solids usage rate in pounds per hour) (1-TE) (1-CE)

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for the automated adhesive coating line)

CE = fractional control efficiency of the control equipment (87.5% for dry filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

h. USEPA Method 24 shall be used to determine the OC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R008 - Honda adhesive coating line no. 2 with two spray booths and one IR oven, modification of PTI 01-8581 issued 4/16/02	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions Limitations/Control Measures	
	R009 and R010.
	See Sections B.2, B.3, and B.4 below.
Organic compound (OC) emissions shall not exceed 17 lbs/hr.	See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008,	

2. Additional Terms and Conditions

2.a The hourly OC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 14,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

3. Coating content may not exceed 5.66 pounds OC per gallon. Cleanup content may not exceed 6.82 pounds OC per gallon.

4. The maximum annual clean up usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the number of gallons of each coating employed;

   c. the number of gallons of each cleanup material employed;

d. the OC content of each coating, in pounds of OC per gallon of coating, excluding water and exempt solvents; and

e. the OC content of each cleanup material, in pounds of OC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:

a. the monthly OC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., [(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 lbs/ton), in tons;

b. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;

c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.

d. the individual HAP[1] content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;

e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from d);

f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP[1] content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP[1] content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

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A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for emissions unit R008 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: n-Hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 4.25
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1267.1
   MAGLC (ug/m3): 4190

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. an identification of each day during which the average hourly OC emission rate from the coatings and cleanup materials exceeded 17 lbs/hr, and the actual average hourly OC emission rate for each such day;

b. the OC content limit for coating materials;

c. the OC content limit for cleanup materials;

d. the rolling, 12-month coating usage limitation;

e. the rolling, 12-month cleanup usage limitation;

f. the rolling, 12-month total individual HAP emission limitation;

g. the rolling, 12-month total combined HAP emissions limitation; and

h. the rolling, 12-month total OC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions

2. The permittee shall submit annual reports which specify the OC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 17 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.

b. Emission Limitation:
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily OC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation may be used:

E = (maximum coating solids usage rate in pounds per hour) (1-TE) (1-CE)

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for the automated adhesive coating line)

CE = fractional control efficiency of the control equipment (87.5% for dry filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

h. USEPA Method 24 shall be used to determine the OC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R009 - Manual touch up spray booth	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions Limitations/Control Measures	
	R005, R006, R007, R008, R009 and R010.
	See Sections B.2, B.3, and B.4 below.
Organic compound (OC) emissions shall not exceed 17 lbs/hr.	See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units	

2. Additional Terms and Conditions

2.a The hourly OC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 14,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

3. Coating content may not exceed 5.66 pounds OC per gallon. Cleanup content may not exceed 6.82 pounds OC per gallon.

4. The maximum annual clean up usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the number of gallons of each coating employed;

   c. the number of gallons of each cleanup material employed;

d. the OC content of each coating, in pounds of OC per gallon of coating, excluding water and exempt solvents; and

e. the OC content of each cleanup material, in pounds of OC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:

a. the monthly OC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., [(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 lbs/ton), in tons;

b. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;

c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.

d. the individual HAP[1] content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;

e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);

f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP[1] content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP[1] content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

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A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for emissions unit R009 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: n-Hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 4.25
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1267.1
   MAGLC (ug/m3): 4190

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

a. an identification of each hour during which the hourly OC emission rate from the coatings and cleanup materials exceeded 17 lbs/hr, and the actual hourly OC emission rate for each such hour;

b. the OC content limit for coating materials;

c. the OC content limit for cleanup materials;

d. the rolling, 12-month coating usage limitation;

e. the rolling, 12-month cleanup usage limitation;

f. the rolling, 12-month total individual HAP emission limitation;

g. the rolling, 12-month total combined HAP emissions limitation; and

h. the rolling, 12-month total OC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions

2. The permittee shall submit annual reports which specify the OC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 17 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.

b. Emission Limitation:
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily OC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation may be used:

E = (maximum coating solids usage rate in pounds per hour) (1-TE) (1-CE)

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for the automated adhesive coating line)

CE = fractional control efficiency of the control equipment (87.5% for dry filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

h. USEPA Method 24 shall be used to determine the OC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None

PART III - SPECIAL TERMS AND CONDITIONS FOR SPECIFIC EMISSIONS UNIT(S)

A. Applicable Emissions Limitations and/or Control Requirements

1. The specific operations(s), property, and/or equipment which constitute this emissions unit are listed in the following table along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures. Emissions from this unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

Operations, Property, and/or Equipment	Applicable Rules/Requirements
R010 - Manual touch up spray booth	OAC rule 3745-31-05(A)(3)
	OAC rule 3745-31-05(C)
	OAC rule 3745-21-07(G)(2)
	OAC rule 3745-17-11(B)(1)
	OAC rule 3745-17-07(A)(1)

Applicable Emissions Limitations/Control Measures	
	R009 and R010.
	See Sections B.2, B.3, and B.4 below.
Organic compound (OC) emissions shall not exceed 17 lbs/hr.	See Sections A.2.b below.
Particulate emissions (PE) shall not exceed 0.2 lb/hr and 0.9 ton/year.	The hourly PE limitation established by this rule is less stringent than that established pursuant to OAC rule 3745-31-05(A)(3).
See Sections A.2.a below.	Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.
The requirements of this rule also include compliance with the requirements of OAC rules 3745-17-07(A)(1) and 3745-31-05(C)	
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.	
The combined total hazardous air pollutants (HAP) emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP and 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008,	

2. Additional Terms and Conditions

2.a The hourly OC limitation and the hourly and annual PE limitations were established to reflect the potential to emit for this emissions unit. Therefore, it is not necessary to develop additional monitoring, record keeping and/or reporting requirements to ensure compliance with these limits.

2.b To avoid the emission limitations/control requirements contained in OAC rule 3745-21-07(G), no photochemically reactive materials (i.e., as raw materials or cleanup materials) shall be employed in this emissions unit.

Note: The definition of "photochemically reactive material" is based upon OAC rule 3745-21-01(C)(5).

B. Operational Restrictions

1. The permittee shall vent all emissions through the dry filtration system whenever this emissions unit is in operation.

2. The maximum annual coating usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 14,000 gallons, based upon a rolling, 12-month summation of the coating usage figures.

3. Coating content may not exceed 5.66 pounds OC per gallon. Cleanup content may not exceed 6.82 pounds OC per gallon.

4. The maximum annual clean up usage for this emissions units R005, R006, R007, R008, R009 and R010 shall not exceed 300 gallons, based upon a rolling, 12-month summation of the coating usage figures.

C. Monitoring and/or Recordkeeping Requirements

1. The permittee shall collect and record the following information each month for the coating operation:

   a. the name and identification number of each coating and cleanup material, as applied;

   b. the number of gallons of each coating employed;

   c. the number of gallons of each cleanup material employed;

d. the OC content of each coating, in pounds of OC per gallon of coating, excluding water and exempt solvents; and

e. the OC content of each cleanup material, in pounds of OC per gallon of cleanup, excluding water and exempt solvents.

[Note: The coating information must be for the coatings as employed, including any thinning solvents added at the emissions unit.]

2. The permittee shall maintain monthly records of the following information:

a. the monthly OC emission rate for all coatings and cleanup materials combined, calculated by summing the calculated emission rate of each coating and cleanup material, i.e., [(C.1.b)(C.1.d)+(C.1.c)(C.1.e)]/(2000 lbs/ton), in tons;

b. the rolling, 12-month summation of the OC emission rate for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in tons;

c. the rolling, 12-month summation of the coating and cleanup materials usage for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010, in gallons.

d. the individual HAP[1] content of each HAP for each coating and cleanup materials in pounds of individual HAP per gallon, as applied;

e. the total combined HAP content of each coating and cleanup materials in pounds of combined HAPs per gallon, as applied (sum of all individual HAP contents from e);

f. the total individual HAP emissions for each HAP from all coating and cleanup material in pounds or tons per rolling, 12-month period (for each HAP the sum of the individual HAP[1] content of each HAP for each coating in term C.2.d times term C.1.b for each coating and the sum of the individual HAP[1] content of each HAP for each cleanup material in term C.2.d times term C.1.c for each cleanup material); and

g. the total combined HAP emissions from all coating and cleanup materials employed, in pounds or tons per month and pounds or tons per rolling, 12-month period (the sum of the total combined HAP content for all coatings in term C.2.e times term C.1.b for each coating and plus the sum of the total combined HAP content for all cleanup materials in term C.2.e times term C.1.c for each cleanup material).

[1]A listing of the HAPs can be found in Section 112(b) of the Clean Air Act or can be obtained by

contacting your Ohio EPA field office or local air agency contact. Material Safety Data Sheets typically include a listing of the solvents contained in the coatings or clean materials. This information does not have to be kept on a line-by-line basis.

3. The permittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

4. The permit to install for emissions unit R010 is evaluated based on the actual materials (typically coatings and cleanup materials) and the design parameters of the emissions unit's exhaust system, as specified by the permittee in the permit to install application. The Ohio EPA's "Review of New Sources of Air Toxic Emissions" policy ("Air Toxic Policy") was applied for each pollutant emitted by this emissions unit using data from the permit to install application and the SCREEN 3.0 model (or other Ohio EPA approved model). The predicted 1-hour maximum ground-level concentration from the use of the SCREEN 3.0 model was compared to the Maximum Acceptable Ground-Level Concentration (MAGLC). The following summarizes the results of the modeling for the "worst case" pollutant(s):

   Pollutant: n-Hexane
   TLV (mg/m3): 176
   Maximum Hourly Emission Rate (lbs/hr): 4.25
   Predicted 1-Hour Maximum Ground-Level Concentration at the Fenceline (ug/m3): 1267.1
   MAGLC (ug/m3): 4190

5. Physical changes to or changes in the method of operation of these emissions units after its installation or modification could affect the parameters used to determine whether or not the "Air Toxic Policy" is satisfied. Consequently, prior to making a change that could impact such parameters, the permittee shall conduct an evaluation to determine that the "Air Toxic Policy" will still be satisfied. If, upon evaluation, the permittee determines that the "Air Toxic Policy" will not be satisfied, the permittee will not make the change. Changes that can affect the parameters used in applying the "Air Toxic Policy" include the following:

   a. changes in the composition of the materials used (typically for coatings or cleanup materials), or the use of new materials, that would result in the emission of a compound with a lower Threshold Limit Value (TLV), as indicated in the most recent version of the handbook entitled "American Conference of Governmental Industrial Hygienists (ACGIH)," than the lowest TLV value previously modeled;

   b. changes in the composition of the materials, or use of new materials, that would result in an increase in emissions of any pollutant with a listed TLV that was proposed in the application and modeled; and

c. physical changes to the emissions unit or its exhaust parameters (e.g., increased/ decreased exhaust flow, changes in stack height, changes in stack diameter, etc.).

If the permittee determines that the "Air Toxic Policy" will be satisfied for the above changes, the Ohio EPA will not consider the change(s) to be a "modification" under OAC rule 3745-31-01 solely due to the emissions of any type of toxic air contaminant not previously emitted, and a modification of the existing permit to install will not be required, even if the toxic air contaminant emissions are greater than the de minimis level in OAC rule 3745-15-05. If the change(s) is (are) defined as a modification under other provisions of the modification definition, then the permittee shall obtain a final permit to install prior to the change.

6. The permittee shall collect, record, and retain the following information when it conducts evaluations to determine that the changed emissions unit will still satisfy the "Air Toxic Policy":

   a. a description of the parameters changed (composition of materials, new pollutants emitted, change in stack/exhaust parameters, etc.);

   b. documentation of its evaluation and determination that the changed emissions unit still satisfies the "Air Toxic Policy"; and

   c. where computer modeling is performed, a copy of the resulting computer model runs that show the results of the application of the "Air Toxic Policy" for the change.

D. Reporting Requirements

1. The permittee shall notify the Ohio EPA, Central District Office in writing of any daily record showing that the dry filtration system was not in service when the emissions unit was in operation. The notification shall include a copy of such record and shall be sent to the Ohio EPA, Central District Office within 45 days after the exceedance occurs.

2. The permittee shall submit quarterly deviation (excursion) reports which identify all exceedances of the following:

   a. an identification of each hour during which the hourly OC emission rate from the coatings and cleanup materials exceeded 17 lbs/hr, and the actual hourly OC emission rate for each such hour;

   b. the OC content limit for coating materials;

   c. the OC content limit for cleanup materials;

d. the rolling, 12-month coating usage limitation;

e. the rolling, 12-month cleanup usage limitation;

f. the rolling, 12-month total individual HAP emission limitation;

g. the rolling, 12-month total combined HAP emissions limitation; and

h. the rolling, 12-month total OC emission limitation.

These quarterly deviation (excursion) reports shall be submitted as described in the General Terms and Conditions

2. The permittee shall submit annual reports which specify the OC, individual HAP and total combined HAP emissions from this emissions unit for the previous calendar year. The reports shall be submitted by April 15 of each year. This reporting requirement may be satisfied by including and identifying the specific emission data from this emissions unit in the annual Fee Emission Report.

E. Testing Requirements

1. Compliance with the emission limitations of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:
OC emissions shall not exceed 17 lbs/hr.

Applicable Compliance Method:
Compliance shall be determined by the record keeping performed pursuant to Section C.1 of this permit.

b. Emission Limitation:
The combined total OC emissions shall not exceed 41 tons per rolling 12-month period for all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the summation of the daily OC emissions per the record keeping requirements specified in Section C.2 of this permit.

c. Emission Limitation:
The individual HAP emissions shall not exceed 9.9 tons per rolling 12-month period for all single HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

d. Emission Limitation:
The combined total HAP emissions shall not exceed 24.9 tons per rolling 12-month period for all HAP from all coatings and cleanup materials used in units R005, R006, R007, R008, R009 and R010.

Applicable Compliance Method:
Compliance shall be based upon the record keeping requirements specified in Section C.2 of this permit.

e. Emission Limitation:
PE shall not exceed 0.2 lb/hr.

Applicable Compliance Method:
To determine the actual worst case particulate emissions rate, the following equation may be used:

E = (maximum coating solids usage rate in pounds per hour) (1-TE) (1-CE)

E = particulate emissions rate (lbs/hr)

TE = transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (75% for the automated adhesive coating line)

CE = fractional control efficiency of the control equipment (87.5% for dry filtration system)

If required, the permittee shall demonstrate compliance with this emission limitation through emissions tests performed in accordance with 40 CFR, Part 60, Appendix A, Methods 1 through 5, and the procedures specified in OAC rule 3745-17-03(B)(10).

f. Emission Limitation:
PE emissions shall not exceed 0.9 ton/year.

Applicable Compliance Method:
The annual emission limitation was established by multiplying the hourly limitation by 8,760 hours/year and then dividing by 2,000 pounds/ton. Compliance with the annual emission limitation may be assumed as long as compliance with the hourly emission limitation is maintained.

g. Emission Limitation:
Visible PE from any stack shall not exceed 20% opacity, as a six-minute average, except as provided by rule.

Applicable Compliance Method:
If required, compliance shall be determined through visible emissions observations performed in accordance with 40 CFR Part 60, Appendix A, Method 9 and the procedures specified in OAC rule 3745-17-03(B)(1).

h. USEPA Method 24 shall be used to determine the OC contents for the coatings and cleanup materials. If an owner or operator determines that Method 24, 40 CFR Part 60, Appendix A cannot be used for a particular coating or cleanup material, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

F. Miscellaneous Requirements

None